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April 5, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Federal-State Joint Board on Universal Service*, CC Docket 96-45; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Lifeline and Link-Up*, WC Docket No. 03-109; *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-235

Dear Ms. Dortch:

On April 4 and 5, 2011, I spoke with Amy Bender, Katie King, and Elise Kohn in the FCC's Wireline Competition Bureau regarding universal service reform. In particular, I reiterated Windstream's long-standing call for the Federal Communications Commission to act now to target support to networks in granular areas where funding is needed most.¹ Such reform is essential to eliminate the rural-rural "digital divide" that has arisen under current federal program rules, wherein certain high-cost areas receive generous support and are served by enhanced network facilities, while other high-cost areas—exhibiting comparable cost conditions—are virtually ignored. This reform also will have the effect of directing support to the areas that are less likely to support cable or other facilities-based competition.²

¹ See, e.g., Comments of Windstream Communications, Inc., WC Dkt. No. 10-90, GN Dkt. No. 09-51, WC Dkt. No. 05-337 (July 12, 2010); Comments of Windstream Communications, Inc., WC Dkt. No. 05-337, GN Dkt. No. 09-51, RM-11584 (Jan. 7, 2010); Comments of CenturyLink, Consolidated Communications, Frontier Communications Corporation, Iowa Telecommunications Services, Inc., and Windstream Communications, Inc., GN Dkt. No. 09-51 (Dec. 7, 2009) (in response to National Broadband Plan Public Notice #19 - The Role of Universal Service and Intercarrier Compensation in the National Broadband Plan); Comments of Windstream Communications, Inc., WC Dkt. No. 05-337 (May 8, 2009); Comments of Windstream Communications, Inc., WC Dkt. No. 05-337 (Apr. 17, 2008).

² See Comments of Windstream Communications, Inc., WC Dkt. No. 05-337, GN Dkt. No. 09-51, RM-11584 (Jan. 7, 2010) at 11 (including data showing that the provision of cable telephony services is highly correlated with—and largely limited to—areas having higher densities and lower per-line costs for building a network).

Please feel free to contact me if you require any additional information.

Sincerely,

/s/

Jennie B. Chandra

cc: Amy Bender
Katie King
Elise Kohn